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January 11, 2021

VIA ECF

The Honorable George B. Daniels, U.S.D.J.
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Topilin v. Tata America International Corporation, et al., 1:19-cv-10839 (GBD)

Dear Judge Daniels:

This firm represents the Plaintiff. We write jointly with Defendants' counsel to respectfully provide Your Honor with a status update and to request an adjournment of the January 14, 2021, 9:45 a.m., status conference.

Discovery is presently scheduled to close on February 9, 2021 and the case is on track: on January 7, 2021, Defendants deposed Plaintiff; and Plaintiff is scheduled to depose Defendants on January 19 and 26. Given the current status of the case, the parties respectfully request that the January 14 conference be adjourned.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,
LIPSKY LOWE LLP

s/ Sara J. Isaacson
Sara J. Isaacson

cc: James Hays, Esq. (via ECF)
Sean Kirby, Esq. (via ECF)

JAN 12 2021 SO ORDERED
The January 14, 2021 initial
conference is adjourned to
April 15, 2021 at 9:30 a.m.
George B. Daniels
HON. GEORGE B. DANIELS